

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
ALAN DWAYNE FRITZ : **CASE NO. 1:24-bk-02554-HWV**
 Debtor : **CHAPTER 13**
 :
MIDFIRST BANK :
 Movant :
 :
 :
 :
ALAN DWAYNE FRITZ :
 Respondent :
 :

**DEBTOR'S RESPONSE TO MOTION OF
MIDFIRST BANK FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

AND NOW, comes Debtor, Alan Dwayne Fritz, by and through his attorney, Gary J. Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded that Movant is the holder of the mortgage.
5. Admitted.
6. Admitted in part and denied in part. Debtor made one (1) payment on February 14, 2025. If the remaining arrearage is two (2) payments, Debtor can catch up over six (6) months.
7. Admitted in part and denied in part. See response to paragraph 6.
8. Denied. The real estate was worth \$406,728.00 at the time of the filing of the bankruptcy in 2024. The balance owed to MidFirst at the time of the filing of the bankruptcy was

\$183,789.62 as indicated by their Proof of Claim. Accordingly, there is an abundance of equity providing adequate protection to the Movant. Further, Debtor will make an offer in the near future to bring the payments current.

9. Denied. The Trustee received a payment of \$200.00 on February 12, 2025. As of the date of this writing, Debtor is current with his Trustee payments.

10. Admitted in part and denied in part. Any fees and costs related to this Motion should be determined as part of the proceedings related to the Motion.

11. Denied. See response to paragraph 10.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: 7/28/25

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF MIDFIRST BANK FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362 upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

BRENT J. LEMON, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

Carol V. Shay

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For Debtor

DATED: 2/28/2025